

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JIMMY LYONS, JACQUELINE LYONS,  
LISA CHAMBERLIN ENGELHARDT,  
GERALD COULTHURST, ENRIQUE  
DOMINGUEZ, FRANCES ERVING,  
JOHNNIE ERVING and ANTHONY  
PAPAPIETRO, individually and on behalf  
of all others similarly situated,

Plaintiffs,

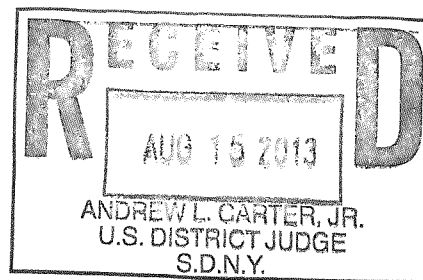
v.

LITTON LOAN SERVICING LP,  
GOLDMAN SACHS GROUP, INC.,  
ARROW CORPORATE MEMBER  
HOLDINGS LLC, SAXON MORTGAGE  
SERVICES, INC., MORGAN STANLEY,  
OCWEN FINANCIAL CORPORATION,  
OCWEN LOAN SERVICING, LLC,  
ASSURANT, INC., AMERICAN  
SECURITY INSURANCE COMPANY,  
STANDARD GUARANTY INSURANCE  
COMPANY, AMERICAN MODERN  
INSURANCE GROUP, and AMERICAN  
MODERN HOME  
INSURANCE COMPANY,

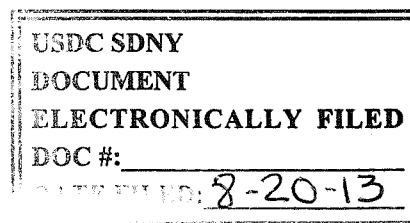
Defendants.

Civil Action No. 1:13-CV-00513

**STIPULATION EXTENDING TIME  
TO ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFFS' FIRST  
AMENDED COMPLAINT**



WHEREAS Plaintiffs Jimmy Lyons and Jacqueline Lyons ("Original Plaintiffs") filed a Complaint against Defendants Litton Loan Servicing LP ("Litton"), The Goldman Sachs Group, Inc. ("Goldman"), and Ocwen Financial Corporation ("OFC") (collectively, "Original Defendants") in the above-captioned action on or about January 23, 2013; and,



WHEREAS prior to any response to the Complaint by any of the Original Defendants, the Original Plaintiffs notified the Court that they intended to amend their Complaint as a matter of course;

WHEREAS Plaintiffs filed their First Amended Class Action Complaint ("FAC") as a matter of course on July 17, 2013;

WHEREAS the FAC names Lisa Chamberlin Engelhardt, Gerald Coulthurst, Enrique Dominquez, Frances Erving, Johnnie Erving, and Anthony Papapietro as additional plaintiffs (collectively with the Original Plaintiffs, "Plaintiffs");

WHEREAS the FAC names Arrow Corporate Member Holdings LLC, Morgan Stanley, Ocwen Loan Servicing, LLC ("OLS"), Assurant, Inc., American Security Insurance, Company, Standard Guaranty Insurance Company, American Modern Insurance Group, and American Modern Home Insurance Company as additional Defendants (collectively with the Original Defendants, "Defendants");

WHEREAS Defendants American Modern Insurance Group, and American Modern Home Insurance Company were served with the FAC on July 25, 2013, and just recently retained counsel to represent their interests in this action;

WHEREAS the undersigned have agreed to a date for Defendants American Modern Insurance Group and American Modern Home Insurance Company to respond to the FAC on the terms set out below;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the parties that Defendants American Modern insurance Group, and American Modern Home Insurance Company, while reserving

all rights, claims, and defenses, shall have through September 17, 2013, to answer or otherwise respond to the FAC, including (without limitation) by making pre-motion conference requests.

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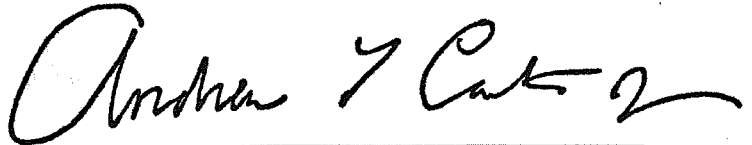
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***Attorneys for Plaintiffs***

**IT IS SO ORDERED.**

Dated: 8-20-13



Judge Andrew L. Carter, Jr.  
United States District Judge

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